



FRED WILLIAMSON & ASSOCIATES, INC.  
*Telecommunications Management Services*

VIA ECFS

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of Secretary  
445 12<sup>th</sup> Street, S. W.  
Washington, D.C. 20554

July 1<sup>st</sup>. 2017

RE: Submission of information Pursuant to FCC 54.313 Rules and Request  
for Confidential Treatment – ETC Annual Reports and Certifications WC  
Docket Nos. 10-90 and 14-58

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, **PINE TELEPHONE COMPANY** or “PINE” (Study Area Code 432017), is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 14-58. Pine by its authorized representative, hereby requests confidential treatment of one attachments to its FCC Form 481: the RUS Annual Telecommunications Operating Report identified on Line 3005, which was redacted in the ECFS submission.

The request for confidential treatment of the financial annual report is being made pursuant to the FCC’s March 22, 2016 Protective Order in WC Docket Nos. 10-90

and 14-58. The financial reports contain competitively sensitive data that is not otherwise available from publically available sources.

The request for confidential treatment is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA).

Pine keeps this information strictly confidential and it is subject to protection under the Freedom of Information Act (FOIA) and the Commission's implementing rules. Release of this information would have a substantial negative impact on the Company.

Pine is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

- Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

Pine requests that the information contained in its annual financial report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company.

Pine offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

*(1) Identification of the specific information for which confidential treatment is sought:*

Attachment to Line 3005 of FCC Form 481 – RUS Operating Report. Specifically, confidential treatment is sought for all information in the report.

*(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:*

The information was submitted in WC Docket Nos. 10-90 and 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form.

*(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:*

The RUS Operating Report for Telecommunication Borrowers contains financial information and subscriber counts for a privately held company, which is not made publicly available.

*(4) Explanation of the degree to which the information concerns a service that is subject to competition:*

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.

*(5) Explanation of how disclosure of the information could result in substantial competitive harm:*

Disclosure of the information contained in the operating report would provide competitors with detailed information regarding the Company's financial position. This would provide competitors access to confidential information they could employ to develop their own plans in a particular service area. This could cause competitive harm to the Company.

*(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:*

The Company has continually treated financial information as confidential and carefully controls the information to protect it from competitors.

*(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:*

The redacted information in the RUS Operating Report are not available to the public, and third party access is limited as described in (6) above.

*(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:*

The Company requests that the extracted information be withheld from public inspection indefinitely. The information and financial details would provide valuable information to competitors for several years beyond that period.

*(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:*

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,

*Tim Morrissey*

President,  
FWA, Inc.

121 East College Street • Broken Arrow, OK 74012 • 918-298-1618

Redacted - For Public Inspection

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	JANE MERZ
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jane@pinetelephone.com
Form Type		54.313 and 54.422

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

<210> For the prior calendar year, were there any reportable voice service outages? No

Page 2

**(300) Unfulfilled Service Request  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

&lt;300&gt; Unfulfilled service request (voice)

0

&lt;310&gt; Detail on attempts (voice)

Name of Attached Document

&lt;320&gt; Unfulfilled service request (broadband)

0

&lt;330&gt; Detail on attempts (broadband)

Name of Attached Document



<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered both fixed and mobile voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	0 . 0
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered both fixed and mobile broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	0 . 0

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
432017OK510 .pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

<b>(600) Functionality in Emergency Situations</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	432017OK610.pdf



<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

-- See attached worksheet --

**(800) Operating Companies  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com
<810>	Reporting Carrier	PINE TELEPHONE COMPANY, INC.
<811>	Holding Company	Pine Telephone Company
<812>	Operating Company	PINE TELEPHONE COMPANY, INC.

[illegible]

**(900) Tribal Lands Reporting  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

&lt;900&gt; Does the filing entity offer tribal land services? (Y/N) Yes

&lt;910&gt; Tribal Land(s) on which ETC Serves

N/A

&lt;920&gt; Tribal Government Engagement Obligation

432017OK920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable
Not Applicable

**(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 432017OK1010.pdf

---

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 432017OK1030.pdf

---

Name of Attached Document



**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

&lt;1100&gt; Certify whether terrestrial backhaul options exist (Y/N)

Yes

&lt;1130&gt; Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

432017OK1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- |        |   |                                     |
|--------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan,  | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan.  | <input checked="" type="checkbox"/> |

**(2005) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<input style="width: 100px; height: 20px;" type="text"/>	
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<input style="width: 100px; height: 20px;" type="text"/>	
<2024A>	Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px;" type="text"/>	<div style="border: 1px solid black; width: 200px; height: 60px;"></div>
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.		
<2025A>	Round 2 Recipient of Incremental Support?	<input style="width: 100px; height: 20px;" type="text"/>	<div style="border: 1px solid black; width: 200px; height: 60px;"></div>
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).		
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)	<input style="width: 100px; height: 20px;" type="text"/>	

Name of Attached Document Listing  
Required InformationName of Attached Document Listing  
Required Information

**(2005) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

&lt;2016&gt; Certification support used to build broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

&lt;2017A&gt; Connect America Fund Phase II recipient?

&lt;2017C&gt; Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

&lt;2018&gt; Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

&lt;2019&gt; Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
Yes - Attach Certification			
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		432017OK3010b.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	432017OK3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or		<input type="checkbox"/>
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3021)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3022)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

**(3005) Rate Of Return Carrier Additional Documentation (Continued)**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

**Financial Data Summary**

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

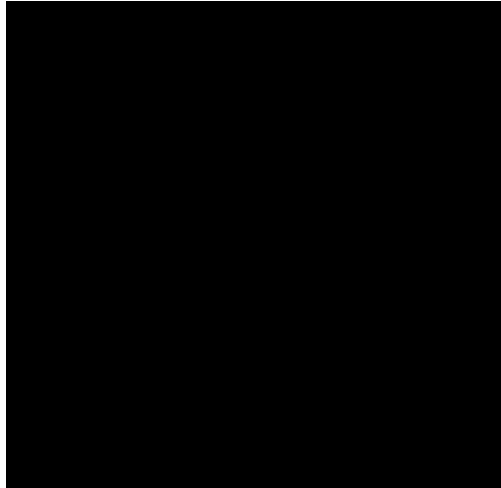
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

**Redacted - For Public Inspection**

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

**4001.** Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a.** RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	432017
<015> Study Area Name	PINE TELEPHONE CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035> Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>FWA, INC.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	FWA, INC.
Name of Reporting Carrier:	PINE TELEPHONE CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/26/2017
Printed name of Authorized Officer:	Esta Callahan
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	5805843100 ext.
Study Area Code of Reporting Carrier:	432017 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	PINE TELEPHONE CO
Name of Authorized Agent Firm:	FWA, INC.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/26/2017
Name of Authorized Agent Employee:	TOM KARALIS
Title or position of Authorized Agent or Employee of Agent	CONSULTANT
Telephone number of Authorized Agent or Employee of Agent:	9182981618 ext.
Study Area Code of Reporting Carrier:	432017 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

<b>(700) Price Offerings including Voice Rate Data</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

[illegible]

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	432017
<015>	Study Area Name	PINE TELEPHONE CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	JANE MERZ
<035>	Contact Telephone Number - Number of person identified in data line <030>	5805843355 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jane@pinetelephone.com

[illegible]

<b>(800) Operating Companies</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

July 2013

[illegible]

**PINE TELEPHONE COMPANY, INC.**

**QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS**

**(USAC DOCUMENT - 432017OK510.PDF)**

**PINE TELEPHONE COMPANY, INC.**  
**QUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES**

**1. Available Customer Service Representatives to Answer Phones**

All calls received by Pine Telephone Company, Inc. during business hours are answered by the third ring. When the assigned customer representatives are unable to answer calls by the third ring, additional representatives are available to help answer phones.

**2. Provide After Hours Emergency Customer Service**

Calls are answered by voice mail. Call logs are reviewed daily by personnel. Customer service representatives have been given a list of questions by Pine Telephone Company, Inc. to ask to assist them in resolving any issues. Unresolved issues are reviewed the following work day. Issues requiring immediate attention are sent to the Pine Telephone Company, Inc. service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. After-hours customer service is also available.

**3. Provide 8 am to 8 pm 6 days a week Hour Internet Help Desk Service**

All calls are answered within 60 seconds. Call logs are reviewed daily by personnel with Managers available to review and address any issues.

**4. Online Bill Payments**

Payments made online are posted to the customer accounts and are viewable on the online customer account summaries within 24 hours. Any encountered problems are reported to the Office Supervisor and resolved as quickly as possible.

## **5. Give Customers Cut-off Warnings**

Notification of the payment due date and the cutoff date are prominently displayed on bills. Customers in danger of losing service will receive a notification to remind them of the late payment. If a customer complains that notice was not given, they are directed to speak with the Office Manager who will work to resolve the matter and prevent it from occurring again. Account balance reports are printed monthly using the company's billing system.

## **6. Minimize Customer Downtime for Services & Make Requested Changes Promptly**

Contact customers regarding all service requests, with a goal of resolving all issues within 48 hours. Any unresolved issues will be resolved contingent on the technician/customer coordination of access to the premises.

## **7. Proactively Monitoring in Case of Major Service Outages**

Service technicians will be made aware of outages affecting customers within an hour. It is the goal of Pine Telephone Company, Inc. to resolve major outages in four hours or less. If an outage has not been resolved within four hours, technicians will begin utilizing all resources, both from within and from without. Technicians establish and accomplish yearly training goals to be better equipped for managing all services.

## **CUSTOMER PRIVACY**

### **Company Confidential Information Policy**

Pine Telephone Company, Inc. has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information.



The policy states: *"You are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge."*

### **Company CPNI Policy**

Pine Telephone Company, Inc. has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that "failure to protect this information result in disciplinary action up to and including discharge for the responsible employee."

As a part of this policy, Pine Telephone Company, Inc. has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

**PINE TELEPHONE COMPANY, INC.**

**EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER**

**(USAC DOCUMENT - 432017OK610.PDF)**

**PINE TELEPHONE COMPANY, INC.**  
**EMERGENCY SITUATION FUNCTIONALITY**  
**AVAILABILITY OF BACK-UP POWER**

Pine Telephone Company, Inc. has one Central Office and one Tandem Office located within its service area. Each of these locations are equipped with a back-up generator capable of providing power to the equipment within that office in the event of an external power source outage. After each power outage, generators are inspected and are also professionally serviced bi-annually to ensure functionality.

**TRAFFIC ROUTING**

Voice traffic between the Central Office switch and remote DLCs is carried across fiber optic cable. Voice traffic between the Central Office switch and the upstream tandem is provisioned across redundant links.

**MANAGING TRAFFIC SPIKES**

Pine Telephone Company, Inc.'s careful capacity planning has put multiple constraints and triggers in place on its Central Office equipment, outside plant equipment, and network backbone that will provide the company with the capability of handling traffic spikes during emergency situations.

- Usage rates are analyzed monthly by Pine Telephone Company, Inc. using reports automatically generated by the switch to ensure that usage does not exceed 80% of total line capacity.
- Pine Telephone Company, Inc. will monitor traffic on a monthly basis to ensure optimal efficiency.

**PINE TELEPHONE COMPANY, INC.**

**TRIBAL LANDS REPORTING**

**(USAC DOCUMENT - 432017OK920.PDF)**

Esta O. Callahan  
President  
John E. Callahan  
Chairman of Board  
Angela Whisenant  
Secretary/Treasurer



Jerry Whisenant  
Plant Manager &  
Board Member  
Bill Teel  
Vice President &  
Assistant Plant Manager

December 12, 2016

Chief Batton,

Pine Telephone Company, Inc. is a rural independent telephone company providing service to approximately 5,000 customers in McCurtain, and Pushmataha counties in Southeast Oklahoma. This includes a number of exchanges and customers in the Choctaw and Chickasaw. Pine offers landline phone service, high speed internet, and long distance as well as opportunities to bundle services together.

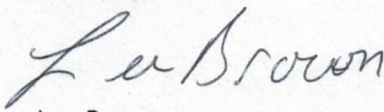
Pine currently provides service to several local community anchor institutions. Most of these, while not receiving a discount for phone service, do receive a free or discounted rate for high speed internet. This partnership allows the institutions the ability to have connectivity worldwide and to offer services to the community at each location. Pine believes that anchor institutions such as community centers, fire stations and city halls are an integral part of the community and provide countless benefits and gathering places to area residents. Pine has the ability to provide service upon reasonable request to anyone in its service area including Tribal community anchor institutions.

Pine is currently deploying high speed internet and fiber to the home service in order to provide service and coverage to an increasing customer base. Through various partnerships and location of its service territory, Pine has the ability to offer ever increasing internet speeds at competitive prices. These speeds will allow for the streaming of video, opportunities for telemedicine, offsite workplaces and remote study opportunities for education. These will allow for the growth of connectivity in a rural landscape granting customers to be ever more connected to the retail environments of urban areas.

Pine also provides Lifeline service in its study areas and to customers that qualify under state and federal guidelines. Only those qualifying for Lifeline and residing on federally recognized Tribal Lands qualify for Link-Up. It can only be used for activating new phone service or activating existing service in a new location. Pine also offers toll limitation service which helps households save money by blocking toll calls from being made, thus preventing costly long distance bills.

Should you have any questions or concerns about Pine services or offerings, or if you should have any concerns that you would like to see Pine address, please do not hesitate to contact me.

Sincerely,

  
Lee Brown

**PINE TELEPHONE COMPANY, INC.**  
**VOICE SERVICES RATE COMPARABILITY**  
**(USAC DOCUMENT - 432017OK1010)**

## Voice Services Rate Comparability

### Pine Telephone Company, Inc.

In compliance with the 54.313 Rules, Pine Telephone Company, Inc. must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2017 Urban Rate Survey conducted by the FCC's Wireline Competition Bureau, the 2016 rate floor for voice services is \$22.49 and the reasonable comparability benchmark for voice services is \$49.51<sup>1</sup>.

The rates shown on the Voice Pricing Form (0700) are below \$49.51. Consequently, Pine Telephone Company, Inc meets the above mentioned requirement.

---

<sup>1</sup> WIRELINE COMPETITION BUREAU ANNOUNCES RESULTS OF 2017 URBAN RATE SURVEY FOR FIXED VOICE AND BROADBAND SERVICES, POSTING OF SURVEY DATA AND EXPLANATORY NOTES, AND REQUIRED MINIMUM USAGE ALLOWANCE FOR ETCs SUBJECT TO BROADBAND PUBLIC INTEREST OBLIGATIONS. WC Docket #10-90, DA 17-167 Public Notice - Released February 14<sup>th</sup>, 2017.



**PINE TELEPHONE COMPANY, INC.**  
**BROADBAND RATE COMPARABILITY**  
**(USAC DOCUMENT - 432017OK1030)**

**BROADBAND RATE COMPARABILITY**  
**PINE TELEPHONE COMPANY, INC. - OKLAHOMA**

**BROADBAND BENCHMARK**

According to the 2017 Broadband Reasonable Comparability Benchmark conducted by the FCC Wireline Competition Bureau (*and using the Reasonable Comparability Benchmark Calculator supplied by the FCC*), the reasonable comparability benchmark for Broadband rates are as follows<sup>1</sup>:

<b>Download Speed</b>	<b>Upload Speed</b>	<b>Usage Allowance</b>	<b>Benchmark</b>
6 Mbps	1 Mbps	Unlimited	\$71.27
10Mbps	1Mbps	Unlimited	\$77.98
15 Mbps	3 Mbps	Unlimited	\$83.82
25 Mbps	5 Mbps	Unlimited	\$90.77

**RATE REQUIREMENT**

Per 47 C.F.R. § 54.313(a)(12), Pine Telephone Company, Inc. pricing can be no more than the applicable benchmark as published annually by the Wireline Competition Bureau. The rates shown on Pine Telephone Company, Inc.'s Broadband Price Offerings Form (0710) are all below the FCC's 2016 Broadband Pricing Benchmarks. Consequently, Pine Telephone Company, Inc. meets the above mentioned requirement.

The Survey also noted that the required minimum usage allowance is 150GBs for rate-of-return carriers, such as Pine Telephone Company, Inc. Pine Telephone Company, Inc. does not currently implement a usage allowance maximum. All broadband customers have unlimited usage allowance.

---

<sup>1</sup> <http://www.fcc.gov/encyclopedia/urban-rate-survey-data>

**PINE TELEPHONE COMPANY, INC.**

**LIFELINE PLAN**

**(USAC DOCUMENT - 432017OK1210.PDF)**

## **Pine Telephone Company**

### **Lifeline Plan – Oklahoma**

Pine Telephone Company, Inc. (Pine) offers Lifeline Telephone Service to its customers. The eligibility criteria for Lifeline service is indicated on the attachment. Upon confirmation of eligibility, appropriate lifeline credits are provided to the customer. Oklahoma also qualifies for an additional credit that may not exceed \$25.00 for Tribal Lands. The rate for basic local exchange service for Pine customers in Oklahoma as of January 1, 2017 was \$18.00. The FCC Rules specify that the basic local exchange service charges net of lifeline credits can't be lower than \$1.00. Since, the total lifeline credits available in Oklahoma exceed the rate charged for basic local exchange service, the lifeline eligible customer pays \$1.00 for basic local exchange service. Pine customers receive unlimited local calling as part of the Basic Local Exchange Service Plan.

No other credits are applied to rates for remaining services, including toll service (if the customer doesn't have toll limitation service). Toll services are assessed at rates charged by the customers prescribed long distance provider.

Federal Poverty Guideline Certification Form  
Page 1 of 2

I certify that all the income actually received by all members of my household is less than or equal to 135% of the federal poverty level, as set forth below. I understand a "household" is any individual or group of individuals who live together at the same address and share income and expenses. I have provided the documentation verifying the income in the categories checked below to Pine Telephone in support of my application for Lifeline/Link Up discounted service. I certify that there are \_\_\_\_\_ members of my household living with me at the address listed below. I also certify that I will notify Pine Telephone within 30 days if my household income exceeds 135% of the Federal Poverty Guidelines. I further certify that the Company representative returned all my documentation to me. I make these certifications under penalty of perjury, punishable by law.

Print Name of applicant: \_\_\_\_\_

Phone#: \_\_\_\_\_

Home Address: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Federal law at 47 C.F.R. §54.400(f) has defined "income" for purposes of eligibility for Lifeline Assistance as all income actually received by all members of the household and includes the following. Please check all the categories of "income" that members of your household currently receive.

- \_\_\_\_\_ Salary before deductions for taxes
- \_\_\_\_\_ Public Assistance benefits
- \_\_\_\_\_ Social Security payments
- \_\_\_\_\_ Pensions
- \_\_\_\_\_ Unemployment compensation
- \_\_\_\_\_ Veteran's Benefits
- \_\_\_\_\_ Inheritances
- \_\_\_\_\_ Alimony
- \_\_\_\_\_ Child Support Payments
- \_\_\_\_\_ Worker's Compensation Benefits
- \_\_\_\_\_ Gifts
- \_\_\_\_\_ Lottery Winnings
- \_\_\_\_\_ Other \_\_\_\_\_

135% of the 2017 federal poverty level guidelines are as follows:

Persons In Household ----- Annual household income no higher than:

1	-----	\$16,281
2	-----	\$21,924
3	-----	\$27,567
4	-----	\$33,210
5	-----	\$38,853
6	-----	\$44,496
7	-----	\$50,139
8	-----	\$55,782

(For each additional person, add: \$5,643)

1 The only exceptions to "income" are student financial aid, military housing and cost-of-living allowances, irregular income from occasional small jobs such as baby-sitting or lawn mowing, and the like.

2 This information is regularly updated by the Federal Government.

---

**For Company Use Only**

Name of Employee Who Reviewed Income Documentation: \_\_\_\_\_

Type of Income Documentation received from applicant: \_\_\_\_\_

---

---

---

---

---

---

---

---

---

---

**PINE TELEPHONE  
LIFELINE/LINK UP AMERICA ON TRIBAL LANDS PROGRAM  
AUTHORIZATION AND CERTIFICATION FORM**

**THE BENEFITS YOU RECEIVE UNDER THE ENHANCED LIFELINE/LINKUP PROGRAM WILL TERMINATE ON JULY 26, 2017 UNLESS YOU COMPLETE ANOTHER AUTHORIZATION AND CERTIFICATION BY JULY 25, 2017 AND RETURN IT TO PINE TELEPHONE.**

**A. YOU MUST MEET PROGRAM PARTICIPATION REQUIREMENTS OR HOUSEHOLD INCOME REQUIREMENTS**

\_\_\_\_\_ I acknowledge that I may be required to re-certify continued eligibility for lifeline at any time and my failure to re-certify as to my continued eligibility will result in de-enrollment and the termination of my Lifeline benefits pursuant to §54.405(e)(4)”(47 C.F.R. § 54.410(d)(3)(ix)). 22 33  
Total 22 33

\_\_\_\_\_ I hereby certify that I participate in at least one of the following programs (CHECK ALL THAT APPLY) OR my household income is at or less than 135% of the federal poverty level:

- \_\_\_\_\_ Supplemental Nutrition Assistance Program (SNAP a/k/a Food Stamps)  
\_\_\_\_\_ Supplemental Security Income (SSI)  
\_\_\_\_\_ Medical Assistance (Medicaid/SoonerCare)  
\_\_\_\_\_ Food Distribution Program on Indian Reservations (“FDPIR”)  
\_\_\_\_\_ Federal Public Housing  
\_\_\_\_\_ Veterans Pension or Survivors Pension  
\_\_\_\_\_ Bureau of Indian Affairs General Assistance;  
\_\_\_\_\_ Temporary Assistance for Needy Families (TANF) Tribally-administered block grant programs;  
\_\_\_\_\_ Head Start Programs (only applicant or customer who satisfy the income qualifying eligibility provision);  
\_\_\_\_\_ OR;  
\_\_\_\_\_ My household income is at or less than 135% of the federal poverty level. There are \_\_\_\_\_ individuals in my household. Customer must provide sufficient proof of income as set forth in 47 CFR §54.400(f).

**B. YOU MUST MEET THE “ONE PER HOUSEHOLD” REQUIREMENT**

- **ONLY ONE PERSON IN A HOUSEHOLD CAN QUALIFY TO RECEIVE PROGRAM BENEFITS.**
- **A “HOUSEHOLD” IS ANY INDIVIDUAL OR GROUP OF INDIVIDUALS WHO LIVE TOGETHER AT THE SAME ADDRESS AND SHARE INCOME AND EXPENSES.**
- **ONLY ONE RESIDENCE TELEPHONE SERVICE OR BROADBAND SERVICE IN A HOUSEHOLD CAN RECEIVE PROGRAM SUPPORT.**
- **A HOUSEHOLD MAY NOT RECEIVE LIFELINE/LINKUP BENEFITS FROM MULTIPLE SERVICE PROVIDERS.**

Do you live at an address at which there are multiple households (for example, a nursing home or group home)?

\_\_\_\_\_ Yes (If yes, you must complete a supplemental form to determine your eligibility.)  
\_\_\_\_\_ No

\_\_\_\_\_ *My initials here certify that my household meets the one-per-household requirement. I understand that falsely certifying eligibility is a violation of the rules of the Federal Communications Commission and will result in my removal from the Lifeline/LinkUp Program and could result in criminal prosecution by the United States government.*

\_\_\_\_\_ *My initials here certify my understanding that Lifeline is a federal benefit and that willfully making false statement to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program*



PINE TELEPHONE  
LIFELINE/LINK UP AMERICA ON TRIBAL LANDS PROGRAM  
AUTHORIZATION AND CERTIFICATION FORM (Page 2)

**C. YOU MUST ACKNOWLEDGE AND CERTIFY THE FOLLOWING STATEMENTS AND NOTIFICATION OBLIGATIONS (You must read and initial all statements below to acknowledge and certify you understand your obligations.)**

- \_\_\_\_\_ I certify that the telephone or broadband service location to which this certification applies is my primary/temporary (circle one) residential service address located at \_\_\_\_\_, and to the best of my knowledge this residential service address is located on former tribal land/reservation (as defined in 25 CFR § 20.1(v)).
- \_\_\_\_\_ I also certify that if the address identified above is a temporary one, I will recertify my temporary residential address every 90 days.
- \_\_\_\_\_ I also certify that if in the future, I no longer live at the address identified above, I will notify Pine Telephone within 30 days.
- \_\_\_\_\_ I certify that I meet the income-based or program-based eligibility criteria for receiving lifeline.
- \_\_\_\_\_ I also certify that I will notify Pine Telephone within 30 days if for any reason I no longer meet the income-based or program-based criteria for receiving Lifeline support, I receive more than one lifeline benefit or another member of my household is receiving a Lifeline benefit.
- \_\_\_\_\_ I also certify that I will notify Pine Telephone within 30 days if I no longer live at the address identified above.
- \_\_\_\_\_ I also certify that:
- \_\_\_\_\_ a. The telephone or broadband service which I am requesting receipt of Lifeline and/or LinkUp benefits for is listed in my name.
  - \_\_\_\_\_ b. I am 18 years or older and am not claimed as a dependent on another person's tax return.
  - \_\_\_\_\_ c. The above service address is my primary/temporary residence, not a second home or business.
  - \_\_\_\_\_ d. My household will receive only one Lifeline/LinkUp service and, to the best of my knowledge, my household is not already receiving a Lifeline/LinkUp service.

**D. YOU MUST ACKNOWLEDGE THE FOLLOWING STATEMENTS (You must read and initial all statements below to acknowledge your understanding of the actions of Pine Telephone you hereby authorize.)**

- \_\_\_\_\_ I authorize Pine Telephone or its duly appointed representative to access any records required to verify these statements in order to confirm my continued participation in the above program. I authorize representatives of the above programs to discuss with and/or provide copies to Pine Telephone, if requested by the company, to verify my participation in the above program and my eligibility for "Enhanced" Lifeline or "Expanded" Link Up benefits.
- \_\_\_\_\_ I authorize Pine Telephone to transmit to the Administrator of the National Lifeline Accountability Database my full name, my full residential address, my date of birth, and the last four digits of my Social Security Number or Tribal Identification Number, the telephone number to be associated with Lifeline/LinkUp Program benefits, the date on which Lifeline/LinkUp service is begun, the date on which Lifeline/LinkUp Program benefits end, the amount of support sought by the Company and the means through which I qualify for Program benefits. I understand that transmission of this information is required to ensure the proper administration of the Lifeline/LinkUp Program. I also understand that if I refuse to have this information transmitted to the Administrator, I will be denied Program benefits.
- \_\_\_\_\_ I understand that lifeline is a non-transferable benefit and I am not permitted to transfer my benefit to any other person.

**E. CUSTOMER/APPLICANT INFORMATION**

Applicant's Name \_\_\_\_\_  
Applicant's Billing Address, if different than identified above \_\_\_\_\_  
Home Phone Number(\_\_\_\_\_) \_\_\_\_\_ Work Phone Number(\_\_\_\_\_) \_\_\_\_\_  
(Your contact number during weekdays between 8 a.m. and 5 p.m.)  
Social Security Number (SSN) last four or Tribal identification number if you do not have a SSN: \_\_\_\_\_  
Date of Birth \_\_\_\_\_

**I AFFIRM, UNDER PENALTY OF PERJURY, THAT THE FOREGOING REPRESENTATIONS ARE TRUE AND THAT PROVIDING FALSE OR FRAUDULENT INFORMATION TO RECEIVE LIFELINE/LINKUP BENEFITS IS PUNISHABLE BY LAW.**

\_\_\_\_\_  
Signature of benefit recipient

\_\_\_\_\_  
Date



**Pine Telephone**  
**Lifeline Household Worksheet**

Name \_\_\_\_\_

Address \_\_\_\_\_

Telephone Number \_\_\_\_\_

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies.

Your household is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

**You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.**

1. Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone or broadband service? (check no if you do not have a spouse or partner) \_\_\_\_\_ **YES** \_\_\_\_\_ **NO**

**If you checked YES, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.**

**If you checked NO, please answer question #2.**

2. Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?

- |  |                                  |                      |                                  |
|--|----------------------------------|----------------------|----------------------------------|
| A. A parent  | _____ <b>YES</b> _____ <b>NO</b> | D. An adult roommate | _____ <b>YES</b> _____ <b>NO</b> |
| B. An adult son or daughter  | _____ <b>YES</b> _____ <b>NO</b> | E. Other _____       | _____ <b>YES</b> _____ <b>NO</b> |
| C. Another adult relative (such as a sibling, aunt, cousin, grandparent, grandchild, etc.) | _____ <b>YES</b> _____ <b>NO</b> |                      |                                  |

**If you checked NO for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the worksheet.**

**If you checked YES, please answer question #3.**

3. Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2? \_\_\_\_\_ **YES** \_\_\_\_\_ **NO**

**If you checked NO, then your address includes more than one household. Please initial lines A and B below, and sign and date the worksheet.**

**If you checked YES, then your address includes only one household. You may not sign up for Lifeline because someone in your household already receives Lifeline.**

**CERTIFICATION**

**Please initial the certifications below and sign and date this worksheet. Submit this worksheet to Pine Telephone along with your Lifeline application.**

- A. \_\_\_\_\_ *I certify that I live at an address occupied by multiple households.*
- B. \_\_\_\_\_ *I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government*

Signature \_\_\_\_\_

Date \_\_\_\_\_

Lifeline/Link Up Applicant Enrollment  
Eligibility Documentation Review Form

---

For Company Use Only

Date: \_\_\_\_\_

Name of Lifeline/Link Up Applicant:

\_\_\_\_\_

Name of Employee Who Reviewed Eligibility Documentation:

\_\_\_\_\_

Type of Eligibility Documentation received from applicant and reviewed:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Lifeline Applicant is 18 years of age or older: \_\_\_\_\_

**PINE TELEPHONE COMPANY, INC.**

**MILESTONE CERTIFICATION**

**(USAC DOCUMENT - 432017OK3010.PDF)**

**Line 3010(b) - Milestone Certification**

Pine Telephone Company, Inc. certifies that, upon a reasonable request, it will provide Broadband services at actual speeds of 10 Mbps downstream / 1Mbps upstream, with latency suitable for real-time applications, including VoIP and usage capacity that is reasonably comparable to urban areas and that requests for such services are met within reasonable amount of time.

**PINE TELEPHONE COMPANY, INC.**  
**CONSOLIDATED FINANCIAL STATEMENTS**  
**(USAC DOCUMENT - 432017OK3017.PDF)**

USDA-RUS		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.	
<b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>		BORROWER NAME	
		[REDACTED]	
INSTRUCTIONS-Submit report to RUS within 30 days after close of the period. For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.		PERIOD ENDING December 2016	BORROWER DESIGNATION [REDACTED]
<b>CERTIFICATION</b>  We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief. <b>ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.</b>  <b>DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII</b> (Check one of the following)  <input type="checkbox"/> All of the obligations under the RUS loan documents have been fulfilled in all material respects  <input type="checkbox"/> There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report  _____ DATE			

PART A. BALANCE SHEET					
ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
<b>CURRENT ASSETS</b>			<b>CURRENT LIABILITIES</b>		
1. Cash and Equivalents			. Accounts Payable		
2. Cash-RUS Construction Fund			. Notes Payable		
3. Affiliates:			. Advance Billings and Payments		
a. Telecom, Accounts Receivable			. Customer Deposits		
b. Other Accounts Receivable			. Current Mat. L/T Debt		
c. Notes Receivable			. Current Mat. L/T Debt-Rur. Dev.		
4. Non-Affiliates:			. Current Mat.-Capital Leases		
a. Telecom, Accounts Receivable			. Income Taxes Accrued		
b. Other Accounts Receivable			. Other Taxes Accrued		
c. Notes Receivable			. Other Current Liabilities		
5. Interest and Dividends Receivable			. Total Current Liabilities (25 thru 34)		
6. Material-Regulated			<b>LONG-TERM DEBT</b>		
7. Material-Nonregulated			. Funded Debt-RUS Notes		
8. Prepayments			. Funded Debt-RTB Notes		
9. Other Current Assets			. Funded Debt-FFB Notes		
10. Total Current Assets (1 Thru 9)			. Funded Debt-Other		
<b>NONCURRENT ASSETS</b>			. Funded Debt-Rural Develop. Loan		
11. Investment in Affiliated Companies			. Premium (Discount) on L/T Debt		
a. Rural Development			. Reacquired Debt		
b. Nonrural Development			. Obligations Under Capital Lease		
12. Other Investments			. Adv. From Affiliated Companies		
a. Rural Development			. Other Long-Term Debt		
b. Nonrural Development			. Total Long-Term Debt (36 thru 45)		
13. Nonregulated Investments			<b>OTHER LIAB. &amp; DEF. CREDITS</b>		
14. Other Noncurrent Assets			. Other Long-Term Liabilities		
15. Deferred Charges			. Other Deferred Credits		
16. Jurisdictional Differences			. Other Jurisdictional Differences		
17. Total Noncurrent Assets (11 thru 16)			. Total Other Liabilities and Deferred Credits (47 thru 49)		
<b>PLANT, PROPERTY, AND EQUIPMENT</b>			<b>EQUITY</b>		
18. Telecom, Plant-in-Service			. Cap. Stock Outstand. & Subscribed		
19. Property Held for Future Use			. Additional Paid-in-Capital		
20. Plant Under Construction			. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill			. Membership and Cap. Certificates		
22. Less Accumulated Depreciation			. Other Capital		
23. Net Plant (18 thru 21 less 22)			. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)			. Retained Earnings or Margins		
			. Total Equity (51 thru 57)		
			. TOTAL LIABILITIES AND EQUITY (35+46+50+58)		
			. 93% % of Total Assets		

USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		OK0550	
		PERIOD ENDING	
INSTRUCTIONS- See RUS Bulletin 1744-2		December 2016	
PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS			
ITEM		PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues			
2. Network Access Services Revenues			
3. Long Distance Network Services Revenues			
4. Carrier Billing and Collection Revenues			
5. Miscellaneous Revenues			
6. Uncollectible Revenues			
7. Net Operating Revenues (1 thru 5 less 6)			
8. Plant Specific Operations Expense			
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)			
10. Depreciation Expense			
11. Amortization Expense			
12. Customer Operations Expense			
13. Corporate Operations Expense			
14. Total Operating Expenses (8 thru 13)			
15. Operating Income or Margins (7 less 14)			
16. Other Operating Income and Expenses			
17. State and Local Taxes			
18. Federal Income Taxes			
19. Other Taxes			
20. Total Operating Taxes (17+18+19)			
21. Net Operating Income or Margins (15+16-20)			
22. Interest on Funded Debt			
23. Interest Expense - Capital Leases			
24. Other Interest Expense			
25. Allowance for Funds Used During Construction			
26. Total Fixed Charges (22+23+24-25)			
27. Nonoperating Net Income			
28. Extraordinary Items			
29. Jurisdictional Differences			
30. Nonregulated Net Income			
31. Total Net Income or Margins (21+27+28+29+30-26)			
32. Total Taxes Based on Income			
33. Retained Earnings or Margins Beginning-of-Year			
34. Miscellaneous Credits Year-to-Date			
35. Dividends Declared (Common)			
36. Dividends Declared (Preferred)			
37. Other Debits Year-to-Date			
38. Transfers to Patronage Capital			
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]			
40. Patronage Capital Beginning-of-Year			
41. Transfers to Patronage Capital			
42. Patronage Capital Credits Retired			
43. Patronage Capital End-of-Year (40+41-42)			
44. Annual Debt Service Payments			
45. Cash Ratio [(14+20-10-11) / 7]			
46. Operating Accrual Ratio [(14+20+26) / 7]			
47. TIER [(31+26) / 26]			
48. DSCR [(31+26+10+11) / 44]			

<p align="center">USDA-RUS</p> <p align="center"><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p> <p align="center"><i>INSTRUCTIONS - See RUS Bulletin 1744-2</i></p>	<p>BORROWER DESIGNATION OK0550</p> <p>PERIOD ENDED December, 2016</p>
---	---

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION							
	1. RATES		2. SUBSCRIBERS (ACCESS LINES)			3. ROUTE MILES	
EXCHANGE	B-1	R-1	BUS NESS	RES DENTIAL	TOTAL	TOTAL (including fiber)	FIBER
	(a)	(b)	(a)	(b)	(c)	(a)	(b)
Broken Bow							
Eagletown							
Hochatown							
Oak Hill							
Wright City							
MobileWireless							
Route Mileage Outside Exchange Area							
Total							
No. Exchanges							



<p align="center">USDA-RUS</p> <p align="center"><b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b></p> <p align="center"><i>INSTRUCTIONS - See RUS Bulletin 1744-2</i></p>	<p>BORROWER DESIGNATION OK0550</p> <p>PERIOD ENDED December, 2016</p>
---	---

<b>Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, &amp; HIGH SPEED DATA INFORMATION</b>
<b>4. BROADBAND SERVICE</b>

Details on Least Expensive Broadband Service								
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps) (d)	Advertised Upload Rate (Kbps) (e)	Price Per Month (f)	Standalone/Pckg (f)	Type Of Technology (g)
Broken Bow								
Eagletown								
Hochatown								
Oak Hill								
Wright City								
Total								

<b>USDA-RUS</b>  <b>OPERATING REPORT FOR</b> <b>TELECOMMUNICATIONS BORROWERS</b>	<b>BORROWER DESIGNATION</b> OK0550
	<b>PERIOD END NG</b> December 2016
	<b>INSTRUCTIONS- See RUS Bulletin 1744-2</b>

**PART D. SYSTEM DATA**

**PART E. TOLL DATA**

<b>1. Study Area D Code(s)</b>  a. 201700 b. _____ c. _____ d. _____ e. _____ f. _____ g. _____ h. _____ i. _____ j. _____	<b>2. Types of Toll Settlements (Check one)</b>  <table> <tr> <td>Interstate:</td> <td><input type="checkbox"/> Average Schedule</td> <td><input checked="" type="checkbox"/> Cost Basis</td> </tr> <tr> <td>Intrastate:</td> <td><input type="checkbox"/> Average Schedule</td> <td><input checked="" type="checkbox"/> Cost Basis</td> </tr> </table>	Interstate:	<input type="checkbox"/> Average Schedule	<input checked="" type="checkbox"/> Cost Basis	Intrastate:	<input type="checkbox"/> Average Schedule	<input checked="" type="checkbox"/> Cost Basis
Interstate:	<input type="checkbox"/> Average Schedule	<input checked="" type="checkbox"/> Cost Basis					
Intrastate:	<input type="checkbox"/> Average Schedule	<input checked="" type="checkbox"/> Cost Basis					

**PART F. FUNDS INVESTED IN PLANT DURING YEAR**

1. RUS, RTB, & FFB Loan Funds Expended	
2. Other Long-Term Loan Funds Expended	
3. Funds Expended Under RUS Interim Approval	
4. Other Short-Term Loan Funds Expended	
5. General Funds Expended (Other than Interim)	
6. Salvaged Materials	
7. Contribution in Aid to Construction	
8. Gross Additions to Telecom. Plant (1 thru 7)	

**PART G. INVESTMENTS IN AFFILIATED COMPANIES**

INVESTMENTS  (a)	CURRENT YEAR DATA		CUMULATIVE DATA		
	Investment This Year	Income/Loss This Year	Cumulative Investment To Date	Cumulative Income/Loss To Date	Current Balance
	(b)	(c)	(d)	(e)	(f)
1. Investment in Affiliated Companies - Rural Development					
2. Investment in Affiliated Companies - Nonrural Development					

<div>USDA-RUS</div> <div>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</div>	BORROWER DESIGNATION
	OK0550
	PERIOD ENDING
	December 2016

PART H. CURRENT DEPRECIATION RATES

Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)

☐ YES

☒ NO

EQUIPMENT CATEGORY	DEPRECIATION RATE
1. Land and support assets - Motor Vehicles	
2. Land and support assets - Aircraft	
3. Land and support assets - Special purpose vehicles	
4. Land and support assets - Garage and other work equipment	
5. Land and support assets - Buildings	
6. Land and support assets - Furniture and Office equipment	
7. Land and support assets - General purpose computers	
8. Central Office Switching - Digital	
9. Central Office Switching - Analog & Electro-mechanical	
10. Central Office Switching - Operator Systems	
11. Central Office Transmission - Radio Systems	
12. Central Office Transmission - Circuit equipment	
13. Information origination/termination - Station apparatus	
14. Information origination/termination - Customer premises wiring	
15. Information origination/termination - Large private branch exchanges	
16. Information origination/termination - Public telephone terminal equipment	
17. Information origination/termination - Other terminal equipment	
18. Cable and wire facilities - Poles	
19. Cable and wire facilities - Aerial cable - Metal	
20. Cable and wire facilities - Aerial cable - Fiber	
21. Cable and wire facilities - Underground cable - Metal	
22. Cable and wire facilities - Underground cable - Fiber	
23. Cable and wire facilities - Buried cable - Metal	
24. Cable and wire facilities - Buried cable - Fiber	
25. Cable and wire facilities - Conduit systems	
26. Cable and wire facilities - Other	

USDA-RUS  <b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>		BORROWER DESIGNATION OK0550	
INSTRUCTIONS – See help in the online application.		PERIOD ENDED December 2016	
<b>PART I – STATEMENT OF CASH FLOWS</b>			
1. Beginning Cash (Cash and Equivalents plus RUS Construction Fund)			
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>			
2. Net Income			
<i>Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities</i>			
3. Add: Depreciation			
4. Add: Amortization			
5. Other (Explain)			
<i>Changes in Operating Assets and Liabilities</i>			
6. Decrease/(Increase) in Accounts Receivable			
7. Decrease/(Increase) in Materials and Inventory			
8. Decrease/(Increase) in Prepayments and Deferred Charges			
9. Decrease/(Increase) in Other Current Assets			
10. Increase/(Decrease) in Accounts Payable			
11. Increase/(Decrease) in Advance Billings & Payments			
12. Increase/(Decrease) in Other Current Liabilities			
13. Net Cash Provided/(Used) by Operations			
<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>			
14. Decrease/(Increase) in Notes Receivable			
15. Increase/(Decrease) in Notes Payable			
16. Increase/(Decrease) in Customer Deposits			
17. Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)			
18. Increase/(Decrease) in Other Liabilities & Deferred Credits			
19. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital			
20. Less: Payment of Dividends			
21. Less: Patronage Capital Credits Retired			
22. Other (Explain)			
23. Net Cash Provided/(Used) by Financing Activities			
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>			
24. Net Capital Expenditures (Property, Plant & Equipment)			
25. Other Long-Term Investments			
26. Other Noncurrent Assets & Jurisdictional Differences			
27. Other (Explain)			
28. Net Cash Provided/(Used) by Investing Activities			
29. Net Increase/(Decrease) in Cash			
30. Ending Cash			

Revision Date 2010

USDA-RUS  OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	BORROWER DESIGNATION  OK0550
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2016
NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	

USDA-RUS  <b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>	BORROWER DESIGNATION  OK0550
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2016
<b>CERTIFICATION LOAN DEFAULT NOTES TO THE OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>	